

## **REMARKS**

Claims 1, 3-10, 13, 16-18, 20 and 36 are pending. The Examiner's reconsideration of the rejections in view of the amendments and remarks is respectfully requested.

Claims 34 and 35 have been rejected under 35 USC 112, first paragraph, as failing to comply with the written description requirement. The Examiner stated essentially that the claims contain subject matter, "deriving knowledge" and "derives knowledge," which was not described in the specification...

Claims 34 and 35 have been cancelled. Reconsideration of the rejection is respectfully requested.

Claims 1-33 have been rejected under 35 U.S.C. 102(a) as being anticipated by *IBM*, "Websphere Application Server Enterprise Services Business Rule Beans (BRBeans)," 2001 (hereinafter *IBM*). Applicants note that Claims 34 and 35 are also addressed under this rejection. The Examiner stated essentially that *IBM* teaches or suggests all of the limitations of Claims 1-35.

Claim 1 is the independent claim.

Claim 1 claims, *inter alia*, "evaluating the data of an externalized inferencing component in the presence of the parameters passed by a trigger point within the program of instructions to perform an inference, wherein the externalized inferencing component is in communication with the program of instructions, wherein the inference is a derivation of the knowledge; and outputting the knowledge derived by the inference to the program of instructions."

*IBM* teaches externalized business rules (see page 32). *IBM* does not teach, "evaluating the

data of an externalized inferencing component in the presence of the parameters passed by a trigger point within the program of instructions to perform an inference,” as claimed in Claim 1. The externalized business rules of *IBM* adhere to externalization techniques, wherein logic and data are implemented for making classifications, for example, for checking whether a truck weight entered is valid (see *IBM*, page 33, point 1). The externalized business rules of *IBM* are not analogous to externalized inferencing components as claimed in Claim 1. For example, one could write an externalized business rule as described in *IBM*, however, *IBM* does not teach how to cause the externalized business rule to do inferencing. The externalized business rules of *IBM* are used for making classifications and do not include inference components. Inferencing derives new knowledge from rules and knowledge. Compare the operation of *IBM*’s IF/THEN statement; the IF/THEN statement of *IBM* is a conditional statement used in only classification and lacks inherent inferencing capabilities. The IF/THEN statement, on its own, lacks the complexity for derive knowledge. The IF/THEN statement is merely a logical argument that cannot be considered an inference as it, by itself, does not derive knowledge. Therefore, *IBM* fails to teach all the limitations of Claims 1.

Claims 3-10, 13, 16-18 and 20 depend from Claim 1. The dependent claims are believed to be allowable for at least the reasons given for Claim 1. Claims 2, 11-12, 14-15, 19 and 21-33 have been cancelled. The Examiner’s reconsideration of the rejection is respectfully requested.

Claim 36 includes similar limitations as Claim 1 and is believed to be allowable for at least the reasons given for Claim 1.

For the forgoing reasons, the application, including Claims 1, 3-10, 13, 16-18, 20 and 36, is

believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

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